

# Conducting D.O.T. Inspections of Natural Gas Systems



**PHMSA**

U.S. Department of Transportation  
**Pipeline and Hazardous Materials  
Safety Administration**



# Contact Information

**John West**

**Pipeline Safety Specialist**

**U.S. Department of Transportation**

**PHMSA Office of Training and Qualifications**

**Office (405) 954-7220**

**Email [John.West@dot.gov](mailto:John.West@dot.gov)**



# Safety Regulations Applicable to Natural Gas Systems

- The Minimum Federal Safety Standards Applicable to the Transportation of Natural Gas and for Pipeline Facilities Used for this Transportation, Are Found in Part 192, Title 49, of the Code of Federal Regulations.

# Part 192 Requirements

- §192.451 Scope.
- Authority: Natural Gas Pipeline Act of 1968 (49 U.S.C. sec. 1671 et seq.)
- Re-Authorized by the Pipeline Inspection, Protection, Enforcement, and Safety Act of 2006 (PIPES)





# Part 190 Regulatory Authority

## §190.203 Inspections and Investigations.

(a) Officers, employees, or agents authorized by the Associate Administrator for Pipeline Safety, PHMSA, upon presenting appropriate credentials, are authorized to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties are relevant to determining the compliance of such persons with the requirements of 49 U.S.C. 60101 et seq., or regulations, or orders issued there under.

# Part 190 Regulatory Authority

## §190.203 Inspections and Investigations.

**(b) Inspections are ordinarily conducted pursuant to one of the following:**

- (1) Routine scheduling by the Regional Director of the Region in which the facility is located;**
- (2) A complaint received from a member of the public;**
- (3) Information obtained from a previous inspection;**
- (4) Report from a State agency participating in the Federal Program under 49 U.S.C. 60105;**
- (5) Pipeline accident or incident; or**
- (6) Whenever deemed appropriate by the Administrator, PHMSA or his designee.**

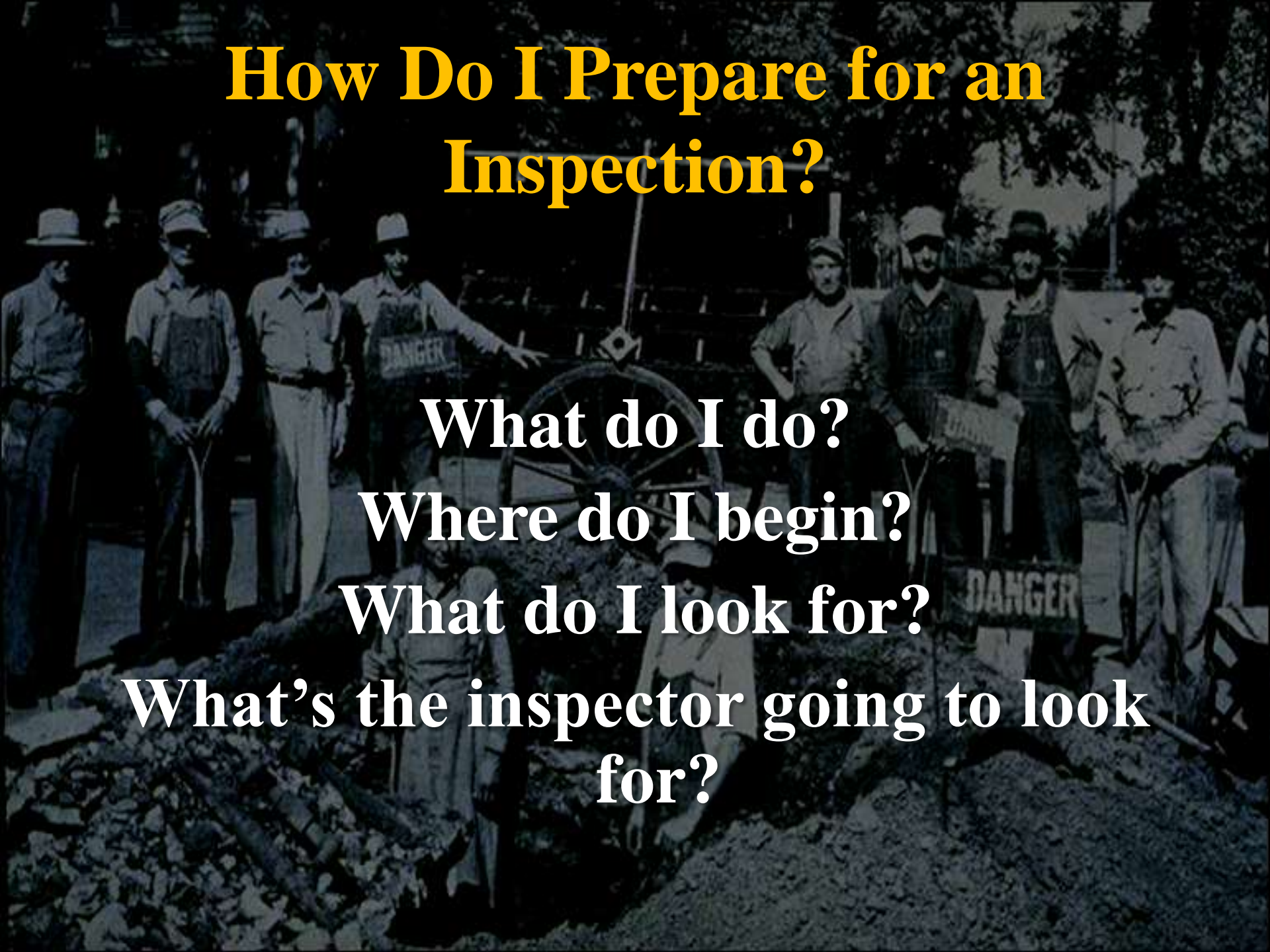
# How Do I Prepare for an Inspection?

What do I do?

Where do I begin?

What do I look for?

What's the inspector going to look for?





# What Type of Inspector Will I Get?

What an inspector will focus on may vary depending on their personality, work background, or recent industry events.

Let's look at a few misconceptions about inspectors.



# Different Types of Inspectors



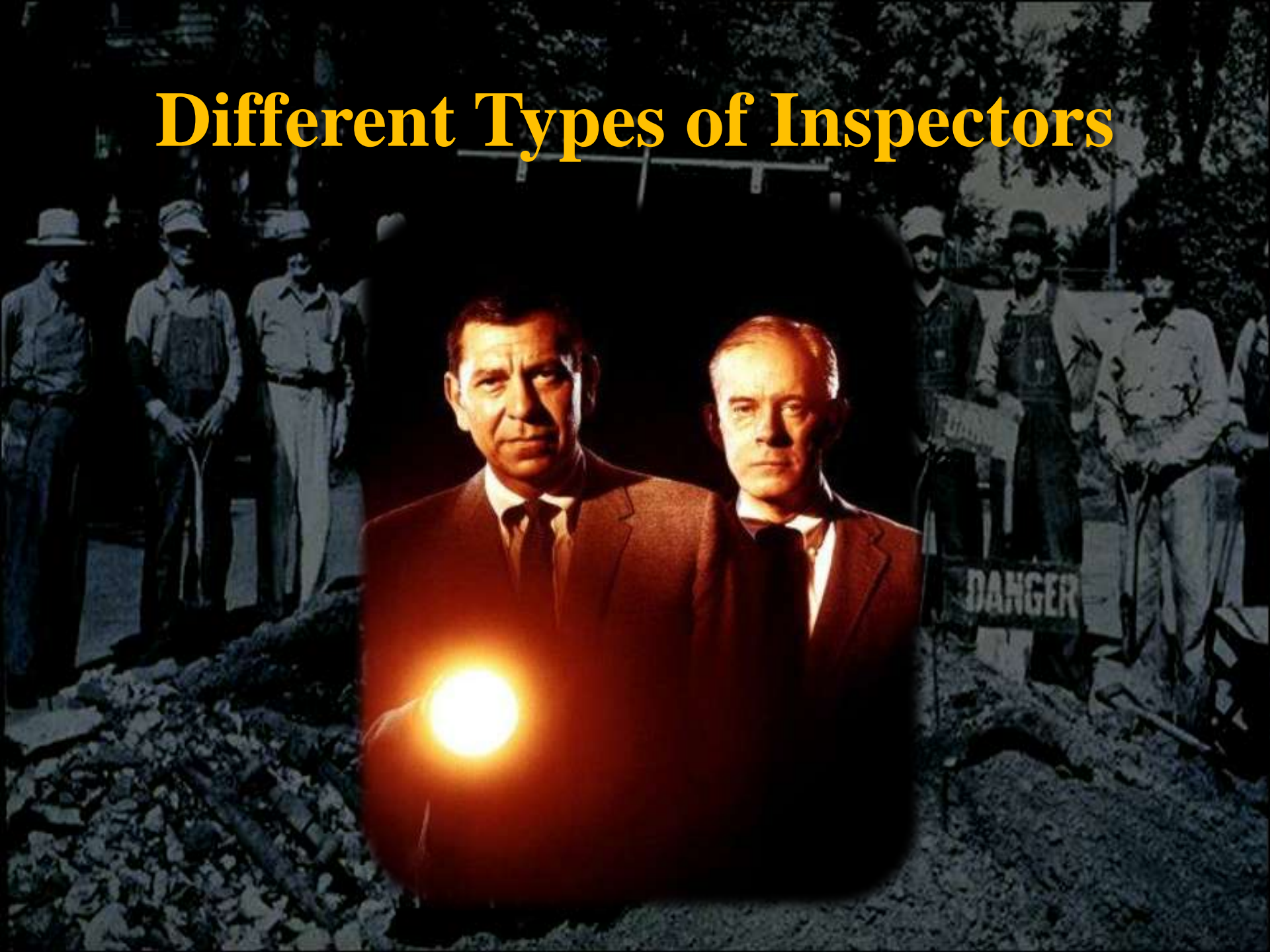


# Different Types of Inspectors





# Different Types of Inspectors



# Where Do I Begin?

- **Think like an inspector.**
  - **Think about code requirements and not just company requirements.**
  - **Make sure you have current operator name, operator official, address, and contact information.**
  - **Make sure you have a complete, up-to-date operations and maintenance manual.**
    - **Does the manual have the right company information?**
    - **Does the manual have procedures and processes to instruct someone how to safely perform operations and maintenance tasks your system, and do all employees have access to it?**
    - **Does the manual have procedures for handling emergencies?**
      - **Emergency response procedures.**
      - **Actions directed toward people first.**



# Where Do I Begin?

- **Think like an inspector.**
  - **Make sure you have a complete and up-to-date operations and maintenance manual. (Continued)**
    - **Does your manual have procedures for reporting accidents / incidents and safety related conditions?**
  - **Make sure you have a complete and up-to-date damage prevention plan.**
  - **Make sure you have a complete and up-to-date public awareness plan.**
    - **Does your plan meet the requirements of API Standard 1162?**
  - **Make sure you have an up-to-date operator qualification plan.**
  - **Make sure you have an up-to-date drug and alcohol plan.**



# Where Do I Begin?

- **Think like an inspector.**
  - **Make sure you have all of the records required by the code for your system.**
  - **Make sure company records contain all code required information for your system.**
  - **Make sure records are complete and up-to-date.**
    - **What work was performed? (New Const., Repair, O&M Task)**
    - **Who performed the work? (Company or Contractor) (OQ)**
    - **When was the work performed? (Date & Time)**
    - **Where was the work performed? (System, Line Segment, Station)**



# How Do I Go About It?

- **Use the tools and inspector will use.**
  - **Use a current and up-to-date code book.**
    - Some code books are only updated once a year and are out of date when they are printed.
    - Download the most current code book from the PHMSA website.
  - **Use a federal inspection report sheet.**
    - You can download a copy of any of the federal inspection sheets from the PHMSA website.
    - Standard, Specialized, Accident, and IMP inspection sheets are all available on the website.

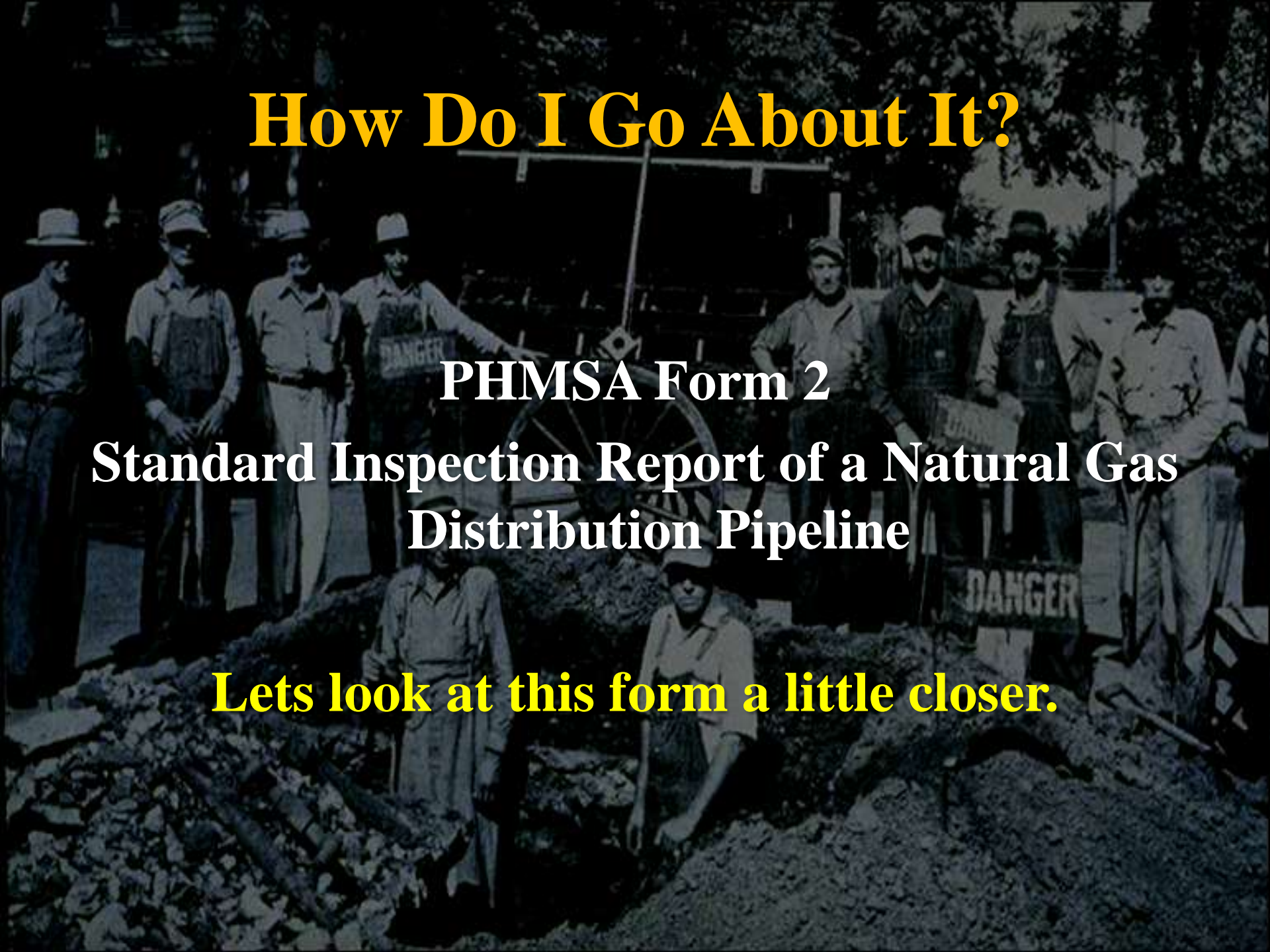


# How Do I Go About It?

## PHMSA Form 2

### Standard Inspection Report of a Natural Gas Distribution Pipeline

Lets look at this form a little closer.





# Be an Informed Operator



# Information Websites

## PHMSA Training and Qualification

<http://www.phmsa.dot.gov/pipeline/TQ>

## PHMSA Pipeline Safety Regulations

<http://www.phmsa.dot.gov/pipeline/TQ/Regulations>



*Remember,  
We're with the Government  
And We're Here to Help!*

